

Searin, T

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY	DOCUMENT
ELECTRONICALLY FILED	
RECEIVED	FEB 04 2008

IN RE XINHUA FINANCE MEDIA, LTD.) MASTER FILE 07 Civ. 3994 (LTS)
 SECURITIES LITIGATION)
)
)
)
)
)
)

STIPULATION AND [PROPOSED] ORDER

WHEREAS, Plaintiffs filed their Consolidated Amended Complaint on October 22, 2007, pursuant to the Court's July 23, 2007 Order (the "Order");

WHEREAS, Defendants filed their Motions to Dismiss on December 21, 2007;

WHEREAS, Plaintiffs' Opposition Memoranda of Law to Defendants' Motions to Dismiss are presently due on February 19, 2008;

WHEREAS, Defendants' Reply Memoranda of Law in support of their Motions to Dismiss are presently due April 4, 2008.

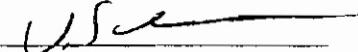
IT IS HEREBY STIPULATED, by and between the Plaintiffs and Defendants, through their respective counsel of record, as follows:

- (1) The deadline for Plaintiffs' Opposition Memoranda of Law to Defendants' Motions to Dismiss is hereby extended through and including March 11, 2008.
- (2) The deadline for Defendants' Reply Memoranda of Law in support of their Motions to Dismiss is hereby extended through and including May 16, 2008.
- (3) Plaintiffs have also agreed to an extension of 10 additional pages on Defendants' Reply Memoranda of Law in support of their Motions to Dismiss. That extension is hereby approved.

Dated: January 30, 2008

BERNSTEIN LIEBHARD & LIFSHITZ, LLP

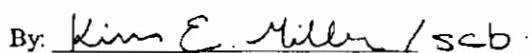
By:


U. Seth Ottensoser
Gregory M. Egleston
10 East 40th Street, 22nd Floor
New York, NY 10016
Telephone: (212) 779-1414
Facsimile: (212) 779-3218
Email: ottensoser@bernlieb.com
Email: egleston@bernlieb.com

Dated: January 30, 2008

KAHN GAUTHIER SWICK, LLC

By:

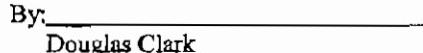

Kim E. Miller
12 East 41st Street - 12th Floor
New York, NY 10017
Telephone: (212) 696-3730
Facsimile: (504) 455-1498
Email: kim.miller@kgscounsel.com

Co-Lead Counsel for Plaintiffs

Dated: January ___, 2008

**WILSON SONSINI GOODRICH & ROSATI
Professional Corporation**

By:


Douglas Clark
Gideon A. Schor
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Tel: (212) 497-7753
Email: dclark@wsgr.com
Email: gschor@wsgr.com

*Attorneys for Defendants Xinhua Finance Media
Ltd., Fredy Bush, and Shelly Singhal*

Dated: January ___, 2008

BERNSTEIN LIEBHARD & LIFSHITZ, LLP

By:

U. Seth Ottensoser
Gregory M. Egleston
10 East 40th Street, 22nd Floor
New York, NY 10016
Telephone: (212) 779-1414
Facsimile: (212) 779-3218
Email: ottenosser@bernlieb.com
Email: egleston@bernlieb.com

Dated: January ___, 2008

KAHN GAUTHIER SWICK, LLC

By:

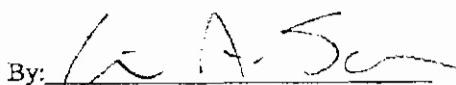
Kim E. Miller
12 East 41st Street - 12th Floor
New York, NY 10017
Telephone: (212) 696-3730
Facsimile: (504) 455-1498
Email: kim.miller@kgscounsel.com

Co-Lead Counsel for Plaintiffs

Dated: January 31, 2008

**WILSON SONSINI GOODRICH & ROSATI
Professional Corporation**

By:


Douglas Clark
Gideon A. Schor
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Tel: (212) 497-7753
Email: dclark@wsgr.com
Email: gschor@wsgr.com

*Attorneys for Defendants Xinhua Finance Media
Ltd., Fredy Bush, and Shelly Singhal*

Dated: January ___, 2008

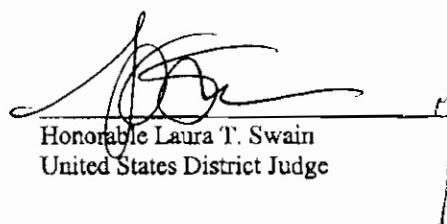
CLIFFORD CHANCE US LLP

By: Mark Kirsch

Mark A. Kirsch
Mark Holland
31 West 52nd Street
New York, New York 10019
Tel: (212) 878-9000
Email: mark.kirsch@cliffordchance.com
Email: mark.holland@cliffordchance.com

Attorneys for Defendants JP Morgan Securities Inc., UBS AG, CIBC World Markets Corp., and W.R. Hambrecht Co. LLC

SO ORDERED this 1 day of February, 2008:


Honorable Laura T. Swain
United States District Judge